

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

GARDENIA OCASIO,	:	CASE NO. 1:14-CV-01585-
	:	NLH-JS
Plaintiff,	:	
	:	
v.	:	
	:	
EQUIFAX MORTGAGE	:	
SOLUTIONS,	:	
<u>et al.</u> ,	:	MOTION OF DEFENDANT
	:	CORELOGIC CREDCO, LLC
	:	FOR LEAVE TO FILE UNDER
Defendants.	:	SEAL DOCUMENTS IN
	:	SUPPORT OF MEMORANDUM
	:	<u>IN REPLY</u>

Pursuant to Local Civil Rule 5.3(c), Defendant CoreLogic Credco, LLC, ("Credco") moves this Court for an order granting leave to file under seal certain documents submitted in support of the Memorandum in Reply to Plaintiff's Opposition to the Motion of Defendant CoreLogic Credco, LLC for Summary Judgment ("Reply Memorandum"). The bases for this Motion are fully set forth below, and Credco therefore states, pursuant to Local Rule 7.1(d)(4), that no brief in support of this Motion is necessary.

1. Credco requests that the Court maintain under seal excerpts from the January 30, 2015 Deposition of Mercedes Vela (attached as Exhibit C to

the Reply Memorandum). Under the Discovery Confidentiality Order Pursuant to L. Civ. R. 5.3 ("Confidentiality Order") [Doc. No. 32], "With respect to any depositions that involve a disclosure of Confidential material of a party to this action, such party shall have until thirty (30) days after receipt of the deposition transcript within which to inform all other parties that portions of the transcript are to be designated Confidential" Confidentiality Order, ¶ 6. Credco designated the excerpts included in Exhibit C as confidential within 30 days of receipt of the transcript.

2. Legitimate private interests warrant the sealing of the documents described above. These materials contain confidential and proprietary information related to Credco's business, the disclosure of which would harm Credco's business. Further, the materials contain certain confidential and personal identifying information pertain to Plaintiff, the disclosure of which would harm Plaintiff's privacy interests. The harms to Credco's business and Plaintiff's privacy are clearly defined and serious injuries.

3. A less restrictive alternative to the sealing of the documents described above is not available. The sealing gives the parties an opportunity to narrow the materials or the scope of information being sealed or to provide the

Court with additional grounds to maintain the documents described above under seal pursuant to Local Rule 5.3(c).

For the foregoing reasons, Credco requests that this Court grant this Motion for leave to file the above materials under seal. A proposed order follows this Motion.

Dated: March 30, 2015

HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER

/s/ Sharon F. McKee

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CoreLogic Credco, LLC

CERTIFICATE OF SERVICE

I certify that on the 30th day of March, 2015, I electronically filed the foregoing Motion of Defendant CoreLogic Credco, LLC for Leave to File under Seal Documents in Support of Memorandum in Reply with the Clerk of Courts using the CM/ECF system, which will send notification of such filing to CM/ECF participants:

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